

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WILSON DIVISION

In re:

KEVIN JOSEPH STRICKLAND

Debtor

Case # 10-00560-8-JRL  
(Chapter 7)

**MOTION TO EXTEND TIME TO OBJECT TO DISCHARGEABILITY OF DEBTS**

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Norwood and Judy Blanchard (“Movants” or “the Blanchards”), by and through their undersigned counsel, respectfully move the Court for an extension of time to object to dischargeability of debts and respectfully show in support thereof:

1. Kevin Joseph Strickland (“Debtor”) filed a petition under Chapter 7 of the Bankruptcy Code on January 26, 2010. The scheduled date of the hearing pursuant to §341 of the Code was March 8, 2010.
2. Despite the fact that Movants had a state court lawsuit pending against the debtor at the time he filed his petition and schedules, Debtor did not list Movants as creditors on his Schedule F or, upon information and belief, elsewhere on his filings.
3. On April 7, 2010, the Trustee moved for an extension of time to file objections to exemptions.
4. On April 9, 2010, the Court, by Order of J. Leonard, United States Bankruptcy Judge, allowed the Trustee’s Motion for Extension of Time to File Objections to Debtor’s Claim of Exemptions through and until Monday, June, 7, 2010.

5. On May 10, 2010, the Court, by Order of J. Leonard, United States Bankruptcy Judge, allowed First Federal's Motion to Extend Time to Object to Dischargeability of Debts through and until Monday, June, 7, 2010.

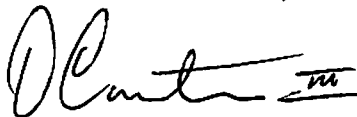
6. Movants are in the process of investigating and reviewing what they believe to be fraudulent acts committed by the debtor.

7. Movants cannot adequately investigate these claims and make a decision as to the appropriate action within the timeframe allowed by the Code and the Rules. It would be appropriate to extend the time during which an objection to the dischargeability of debts can be filed. Such an extension will not prejudice the Debtor or any other party in interest as the Trustee has already obtained an extension until August 5, 2010, and First Federal has obtained an extension until July 8, 2010.

WHEREFORE, Norwood and Judy Blanchard respectfully request that this Court extend the time allowed for Norwood and Judy Blanchard to file objections to the dischargeability of debts owed to them be extended to July 8, 2010, and for such other and further relief as the Court deems just and proper.

Date: June 7, 2010

CARTER & CARTER, P.A.

A handwritten signature in black ink, appearing to read "Oliver Carter III", with a stylized flourish at the end.

/s/Oliver Carter III

Oliver Carter III, NC State Bar #36161  
Attorney for Norwood and Judy Blanchard  
408 Market Street  
Wilmington, NC 28401  
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UNITED STATES BANKRUPTCY COURT  
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**NOTICE OF MOTION**

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***Notice is Hereby Given*** that Norwood and Judy Blanchard have filed a **Motion to Extend Time to Object to Dischargeability of Debts**, in this case. A copy of the Motion is attached.

***Your rights may be affected.*** You should read these papers carefully and discuss them with your attorney if you have one in this bankruptcy case. (If you do not have an attorney you may wish to consult one.)

***If you do not want the court to grant the relief sought*** in the motion or if you want the court to consider your views on the motion, then on or before **FOURTEEN (14) DAYS** from the **mailing** date of this Notice shown below, you or your attorney must file a written response explaining your position, and a request for hearing with the court, all pursuant to Local Bankruptcy Rules 9013-1 and 9014-1. Local Bankruptcy Rules require attorneys admitted to practice in the Eastern District of North Carolina, including attorneys admitted *pro hac vice*, to file all documents electronically, unless an exception is made by the bankruptcy clerk. Local Rules regarding electronic filing and electronic filing of papers may be done through the court's website: [www.nceb.uscourts.gov](http://www.nceb.uscourts.gov). If you are unable to file your response electronically, you may file your response with the bankruptcy clerk and you must also mail a copy to the movant's attorney, at the following addresses:

U. S. Bankruptcy Clerk  
1760-A Parkwood Blvd. W  
Wilson, NC 27893-3564

with copy to

Oliver Carter III  
Attorney for Norwood and Judy Blanchard  
408 Market St.  
Wilmington, NC 28401

If your response is filed in writing within the time indicated, a hearing will be conducted on the motion and your response at a date, time, and place to be set by the court and all parties will be notified accordingly. Any party filing a response shall appear at the hearing in support of his or her response or may be assessed with costs.

If you or your attorney do not file a response, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Date of Mailing: June 7, 2010

CARTER & CARTER, P.A.

A handwritten signature in black ink, appearing to read "Oliver Carter III", with a stylized flourish at the end.

/s/ Oliver Carter III

Oliver Carter III, NC State Bar No. 36161  
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E-mail: [oliver@carterandcarterlaw.com](mailto:oliver@carterandcarterlaw.com)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies under penalty of perjury that he is over eighteen (18) years of age, and that the foregoing

**NOTICE OF MOTION TO EXTEND TIME TO OBJECT TO DISCHARGEABILITY OF DEBTS**

was this day served upon the below named persons, parties and/or counsel by [x] mailing, postage prepaid, first class mail; [ ] personal delivery, of a copy of such instruments to such persons, parties and/or counsel at the address shown below:

James B. Angell  
Chapter 7 trustee  
Howard, Stallings, From & Hutsen, PA  
P.O. Box 12347  
Raleigh, NC 27605-2347

Kevin Joseph Strickland  
215 Murraytown Road  
Burgaw, NC 28425

Brian Behr  
Bankruptcy Administrator's Office  
P.O. Box 3758  
Wilson, NC 27895

Kevin Joseph Strickland  
P.O. Box 220  
Burgaw, NC 28425

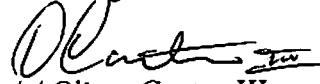
Kevin Joseph Strickland  
865 Riverbend Drive  
Burgaw, NC 28425

Diane P. Furr  
Poyner Spruill, LLP  
301 South College Street, Suite 2300  
Charlotte, NC 28202

Mr. Vaiden Kendrick  
Attorney at Law  
310 N. Front Street, Suite #250  
Wilmington, NC 28401

Date: 6/7/10

CARTER & CARTER, P.A.  
408 Market Street  
Wilmington, NC 28401

  
/s/ Oliver Carter III

Oliver Carter III, State Bar # 36161